

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #23
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Peter Lisichenko, OSC

Date: 11/14/2018

Reporting Period: 11/13/18 to 11/14/2018

1. Introduction

1.1 Background

Site Number:	A28U	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/17/2018	Start Date:	10/17/2018
Demob Date:		Completion Date:	
CERCLIS ID:	NYD088413877	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not

maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

All boiler and process operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are continuing.

ERRS contractor continued to excavate contaminated soil in the processing area. Starting at the location known as the Steel Sump, the work is extending east towards the Byproducts Processing area. The depth of excavation is from the surface down to 6-inches below grade and is intended to mitigate the migration of contaminants to the stormwater system. Sludge like material is being bulked in 55-gallon drums while the stained soils are being staged in lined containment areas. To date, approximately 69-cubic yards have been excavated. Disposal characterization samples have been collected by the RST contractor and submitted for analysis. Excavated areas are being backfilled with 2-inch crusher-run gravel (with fines).

The ammonia solution transfer from the south storage tank (ST23) to the weak ammonia liquor tank (PT02) continues. The transfer operations are being performed every other day to allow processing time for the distillation process. For this operational period, approximately 18,370 gallons of ammonia solution were transferred from the south to the north tank for treatment. In total, approximately 143,700 gallons of ammonia solution have been processed.

A winterization task list has been generated for the Site with assistance by former Tonawanda Coke Corporation (TCC) employees. Tasks include the wrapping of pipes and tanks and ensuring pumps and steamlines are maintained. In addition, the steam, water, and electrical systems are being evaluated to determine what portions of the facility can be taken off-line and deenergized. This is being done to minimize operational costs as well as reduce the potential of fires in areas unoccupied.

A coal and coke brokerage company (Powers Coal & Coke) had recently petitioned the bankruptcy court contending that they have ownership of the remaining coal, coke and coal tar on-site and that the products should be released. A court hearing today ruled in their favor. The owner of Powers contacted the OSC on-site and explained that they will be making arrangements for the shipping of the coal and coke, the release of coal tar material is still pending analytical results. A on-site meeting between Powers and EPA OSC's is tentatively planned for next week.

On Wednesday, November 14, 2018, a briefing was held for the state and local elected officials and community stakeholders. Both EPA and New York State Department of Environmental Conservation (NYSDEC) provided updates on actions taken at the site (including air monitoring during the coke oven shutdown) and EPA's current response action. A follow-up briefing is anticipated in two weeks.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

1. Continuing operating the boiler and supporting systems.
2. Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
3. Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
4. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
5. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
6. Continue to maintain and monitor both the plant process water and the surface storm water systems
7. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
8. Clean and subsequently remove the plant process containment areas.
9. Winterize the vessels and pipes on the Site to protect from freezing.

10. Evaluate methodology for sealing the sumps at the site.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

EPA is funding the removal action. The costs below include pending costs.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$550,000.00	\$431,743.33	\$118,256.67	21.50%
TAT/START	\$50,000.00	\$0.00	\$50,000.00	100.00%
Intramural Costs				
Total Site Costs	\$600,000.00	\$431,743.33	\$168,256.67	28.04%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC, 15 ERRS personnel and 2 RST3 personnel.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.